



# RECRUITMENT VETTING STANDARD OPERATING PROCEDURE

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| <b>RECRUITMENT VETTING STANDARD OPERATING PROCEDURE (SOP)</b> |   |  |  |
| <b>REFERENCE.</b>   | SOP/243/10  |  |  |
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| <b>PORTFOLIO</b>  | Deputy Chief Constable                                  |  |  |
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| <b>THIS POLICY REPLACES:</b>                                  | This SOP replaces the Baseline Vetting SOP (SOP/173/08) |  |  |
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| 1.3   | Sep 2010  | Publication of ACPO National Vetting Policy and Procedures | Gary Williams,<br>Force vetting<br>Officer, PSD. |



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## **RECRUITMENT VETTING STANDARD OPERATING PROCEDURE**

### **1 INTRODUCTION**

- 1.1 This procedure enforces and is subject to the conditions of the Vetting Policy (Policy/247/10).
- 1.2 Recruitment Vetting provides British Transport Police (BTP) with an assurance as to the integrity and reliability of persons seeking employment within the police community.
- 1.3 The purpose of this procedure is to outline the roles, responsibilities and requirements of BTP in relation to vetting. The procedures outline who are responsible for carrying out vetting through to decision making, storage and disposal of vetting records.
- 1.4 This procedure applies to England, Wales and Scotland.
- 1.5 This procedure applies to all BTP employees, volunteers, members of other agencies and those acting as our servants or agents.

### **2 KNOWLEDGE**

#### **2.1 Terms and Definitions**

- 2.1.1 Recruitment Vetting is the process which underpins the recruitment of BTP staff and Non Police Personnel.
- 2.1.2 Baseline Checks – these are the checks undertaken by the Vetting Unit on receipt of the Personal Information Questionnaire and Vetting Verification Record (see Associated Documents).
- 2.1.3 Personal Information Questionnaire (PIQ) – this is the form that is used to record details of the applicant in relation to Baseline Vetting and Non Police Personnel Vetting.

2.1.4 Vetting Verification Record – this is the form that is completed by the recruiting department to ensure that the necessary identity documents have been checked and that this is submitted together with the PIQ. Where there is any doubt in relation to identity documents this should be referred to the Force Vetting Officer (FVO).

2.1.4 Non Police Personnel – This relates to individuals other than police officers, police staff and members of the Special Constabulary.

2.1.5 National Security Vetting - the purpose of National Security Vetting is to protect sensitive government security information, by providing an acceptable level of assurance as to the integrity of individuals who have access to protectively marked government assets and/or who require access to persons, sites and materials, at risk of terrorist attack. A list of those posts subject to National Security Vetting is at [Appendix A](#). Further guidance in relation to National Security Vetting can be found in the National Security Vetting SOP.

2.1.6 Management Vetting (MV) and Enhanced Management Vetting (EMV) - the purpose of MV and EMV is to provide a means of ensuring persons serving in posts designated as high risk, with access to police information, intelligence, financial or operational assets have been assessed as to their reliability and integrity. A list of those posts subject to MV and EMV is at [Appendix A](#). Please contact the FVO if you require further information.

2.1.7 Residency Criteria – the purpose the following minimum periods of UK residency apply

- Baseline Vetting – 3 years
- Management Vetting – 5 Years
- Non Police Personnel Vetting – 3 Years



2.1.8 National Security Residency Criteria – the following minimum periods of UK residency apply.

- Counter Terrorist Check – 3 Years
- Security Clearance – 5 Years
- Development Vetting – 10 Years

2.1.9 Baseline Vetting – This is the process and procedures relating to the recruitment of Police Officers, Police Staff and Special Constables to BTP (See 3.2)

2.1.10 Non Police Personnel Vetting – This is the process and procedures relating to staff who are not recruited to the BTP but require physical or remote access to police premises, information, intelligence, financial or operational assets and to assess their reliability and integrity. The procedure serves to reduce the risks of unauthorised disclosure or loss of sensitive police assets. (See 3.3)

## **2.2 Responsibilities**

2.2.1 The Deputy Chief Constable (DCC) is responsible for the implementation and integrity of the vetting process and ensuring the allocation of resources and promoting these procedures throughout BTP.

2.2.2 The FVO is responsible for establishing vetting policies, procedures and standards for BTP and implementing processes in line with Association of Chief Police Officers (ACPO) National Vetting Policy for the Police Community.

2.2.3 Departmental Heads and Area Commanders are responsible for ensuring that all staff that have responsibility for recruitment (including Non Police Personnel) follow established policies, procedures and standards before allowing anyone access to BTP premises or information. They should report any non compliance with policies and procedures to the FVO.

### **3 RECRUITMENT**

#### **3.1 Recruitment – General**

3.1.1 All persons seeking recruitment to BTP, this includes prospective Police Officers, Special Constables, Police Staff, Police Community Support Officers, BTPA, Community Volunteers, members of other agencies and those acting as our servants or agents will be required to be vetted to the levels shown below.

3.1.2 As there are no national guidelines in respect of police staff recruitment and due to the increasingly wide range of duties carried out by police staff, and resultant access to information, assets and premises, the vetting criteria for the recruitment of police officers and members of the Special Constabulary has been extended to include persons applying for police staff vacancies.

3.1.3 Foreign nationality is not an automatic bar to recruitment or to granting a vetting clearance. However, persons must have resided in the UK for a reasonable period. The purpose of the residency criteria is to ensure that applicants have a “checkable history” in the UK to assist Chief Constables in discharging their obligation to run an efficient and effective Force. Additionally, the criterion provides some reassurance when considering the Health and Safety of their staff and the public. This duty cannot be fulfilled if the Chief Constable is incapable of assessing the honesty, integrity and reliability of their appointees against the information, or lack of information, available. These periods are shown at 2.1.7 and 2.1.8 and are amplified below:

- For all staff a minimum period of 3 years continuous residency will normally apply. It is further recognised that in the wider policing arena, outside of the vetting community, there is an imperative for the composition of the police service to reflect the communities it serves. Therefore, in **EXCEPTIONAL** circumstances, a Chief Officer may elect to depart from the strict application of the residency criteria. Such departure will require the authority of a Chief Officer and **MUST** follow the submission of both a business case and full risk



assessment conducted on an individual case by case basis (i.e. no blanket appointments will be permissible).

- Where members of police staff are subject to National Security Vetting then national rules with regard to residency will apply. The final decision in relation to acceptable residency time limits and vetting clearance resides with the FVO.
- Where it is possible to make vetting enquiries in overseas jurisdictions, it is viable for the minimum residency period for vetting levels to be removed. However, this can only be done where it is possible to make checks in the relevant jurisdictions with local Law Enforcement and National Security bodies, which are equivalent to the enquiries which would be made in the UK, on both the applicant and all family members and associates, as detailed within the ACPO/ACPOS (ACPO Scotland) National Vetting Policy. This is in relation to Force Vetting only and does not apply to National Security Vetting.
- Where the applicant has resided abroad due to the fact that they have been serving in the British armed forces or on UK Government Service, they are considered to have been resident in the UK. For such individuals, in addition to the checks outlined in this SOP, enquiries should also be made with the Ministry of Defence (MOD) or relevant Departmental Security Officer.
- In cases where it is not possible to make the equivalent checks, the residency criteria must be stringently enforced. However, it has been recognised in the ACPO Equality Impact Assessment and legal opinion, that whilst the Policy is not directly discriminatory, there may be an element of indirect discrimination, albeit justifiable on the grounds of law enforcement and national security.

## **3.2 Recruitment Vetting Police Staff**

3.2.1 Applicants for all police staff positions will complete a PIQ Baseline (see Associated Documents) which contains information in relation to personal and financial questions required for vetting. This completed questionnaire together with the Vetting Verification Form (see Associated Documents) should be forwarded to the appropriate Vetting Unit. This level of clearance will allow personnel access to police marked assets up to

CONFIDENTIAL and occasional access to SECRET and access to BTP premises.

- 3.2.2 Vetting checks for Police Officers, PCSO's and Special Constables will only be conducted once the assessment centre has been passed. All Police Officers, Special Constables and PCSO's will additionally be required to complete a Counter Terrorist Check (CTC) Vetting Form ([See National Security Vetting SOP](#)).
- 3.2.3 Where prospective police recruits are not appointed for several months the information provided could be out of date, e.g. the individual could have been arrested and convicted in the interim period. Therefore in order to avoid this, applicants must be provided with their original application forms and security questionnaire and be required to re-sign and re-date these forms. They must additionally be warned of the consequences of failing to provide BTP with accurate information. Where applicants notify relevant changes, the implications of their declarations should be assessed by the Vetting Unit prior to attestation.
- 3.2.4 Where police officers are seconded from another force, sufficient details should be forwarded to the Vetting Unit to allow them to make checks with the parent force to ensure that there are not any issues and to ensure that there is no higher vetting required.
- 3.2.5 The guidance in relation to the transfer of Police Officers is available at [Appendix B](#).
- 3.2.6 It may well be that some police staff will be required to be vetted to a higher level. In these circumstances Line Managers should follow the guidelines in relation to clearance levels and criteria at [Appendix A](#).

### **3.3 Recruitment Vetting - Non-Police Personnel**

- 3.3.1 The purpose of 'Non Police Personnel Vetting' (NPPV) is to provide a means of



ensuring that any persons other than police officers, police staff and members of the special constabulary, having physical or remote access to police premises, information, intelligence, financial or operational assets have been assessed as to their reliability and integrity and thus suitability for clearance. The procedure serves to reduce the risks of unauthorised disclosure or loss of sensitive police assets.

3.3.2 There are three NPPV Levels, NPPV 1, NPPV 2 and NPPV 3.

- **NPPV Level 1** – applies to those persons having unsupervised access to police premises but no access to any electronic systems and/or hard copy material. In the main this applies to utility workers (such as plumbers, electricians etc) and may, on occasions, apply to individuals on work experience if they have NO access to protectively marked information or electronic systems.
- **NPPV Level 2** - applies to those persons having frequent and regular unsupervised access to police premises and/or access to police information and/or hard copy material or protectively marked material, either on police premises or by remote access. National Security may be applied where appropriate. Level 2 allows regular access to police protectively marked assets up to CONFIDENTIAL and occasional access up to SECRET.

3.3.3 Those that would be subject to this level of vetting are: Temporary Staff (including agency staff), Customs, Immigration and Department for Work and Pensions (DWP) employees and other Crime and Disorder partners, Consultants, researchers, auditors, and interpreters, Persons on work experience, Volunteers assisting police on a structured or regular basis, External trainers (where access is given to BTP information and/or assets), Lay visitors and Railway Safety Accreditation Scheme Members.

3.3.4 **NPPV Level 3** – applies to all Non Police Personnel who require long term, frequent and uncontrolled access to SECRET – POLICE, and occasional access to TOP SECRET – POLICE assets.

- 3.3.5 Applicants will complete the relevant PIQ which contains information in relation to personal and financial questions required for vetting. This completed questionnaire together with the Vetting Verification Form should be forwarded to the Vetting Unit. It may well be that some non police personnel will be required to be vetted to a higher level. In these circumstances departments should follow the guidelines in relation to clearance levels and criteria.
- 3.3.6 Vetting for NPPV Level 1 will normally be processed through the Facilities Help Desk (FHQ) who will then supply the contracting company with NPPV Level 1 PIQs. Completed questionnaires should be forwarded to the Vetting Unit. Once vetting checks have been completed the Vetting Unit will provide the premises where the work will be taking place with a list of vetted personnel. This list should be used locally to carry out identity checks. In addition all contractors should be signed in and treated as visitors.
- 3.3.7 Persons who are admitted to police premises as visitors and kept under constant supervision need not be vetted. However, it is important that supervising staff ensure that visitors do not have access to material or overhear conversations from which sensitive information may be obtained. In cases of emergency, non-vetted non-police personnel who cannot be kept under constant supervision, may be admitted to police premises, provided that PNC and crime intelligence checks are completed satisfactorily prior to admission. Where this happens the FVO must be consulted.
- 3.3.8 All contracts and agreements must contain clauses mandating the requirements of this policy, and the fact that BTP reserves the right, without explanation, to withdraw consent for access to BTP premises or information systems.
- 3.3.9 Great care should be exercised in negotiations where individuals seek to vary or omit these terms. As a general rule, contracting on the supplier's terms and conditions will not adequately protect BTP's interests. In whatever category, binding terms must include the other party notifying the FVO of any change of status affecting the honesty,

reliability or sobriety of persons subject to the terms of the contract.

### **3.4 The Vetting Process**

3.4.1 The purpose of the vetting is to provide an assurance as to the integrity and reliability of persons seeking employment within the police community.

3.4.2 Vetting will only be conducted on the successful candidate. The Vetting Unit will not pre-vet short-listed staff. Successful candidates will then be required to complete the PIQ as soon as practicable.

3.4.3 Once received the recruiting departments should carry out the following checks prior to submission to the relevant Vetting Unit:

- check for completeness of the PIQ;
- check that the candidate meets the guidance on suitability (e.g. residence and declared criminal convictions);
- check identity documents;
- check proof of residency documents.

Acceptable forms of identification (ID) and residency are shown on appropriate PIQ.

3.4.4 If the applicant does not meet the criteria as shown in the associated documents the Vetting Unit should still be informed so that a record can be made in case of any future applications or enquiries from other Police Forces.

3.4.5 If the applicant meets the above criteria then the appropriate PIQ together with the Vetting Verification Records should be sent to the Vetting Unit.

3.4.6 On receipt of the completed PIQ and Vetting Verification Record the Vetting Unit will carry out a number of checks and will document the results of these checks on the Vetting Verification Record together with the rationale for their decision. These checks consist of the following:



- Check Vetting Verification Record for correct recording of applicant details and identity/residency documents checked;
- PNC/FIS/Crime Recording (applicant, partner/spouse and immediate family members shown on appropriate vetting form);
- Local checks with Home Office Force (applicant, partner/spouse and immediate family members shown on appropriate vetting form) via INI;
- SB Checks;
- Financial checks as appropriate to level of vetting (Experian);
- Professional Standards checks (as appropriate);
- Open source Internet checks as required;

3.4.7 Difficult or complicated cases will be passed to next level of vetting unit management for advice.

### 3.5 Notification and Refusal

3.5.1 The Vetting Unit will inform the recruitment department of the results of vetting checks. If the applicant has failed, the Vetting Officer will inform the recruiting department of the reason behind the failure. The recruiting department can inform the applicant of the general circumstances behind the failure. The Vetting Unit will only withhold information where information would breach the circumstances ([outlined in paragraph 3.5.4](#)). Where applicants are notified of an adverse vetting decision, they should be informed of the existence of the relevant appeal/review process. In relation to NPPV Level 1 where a contractor has failed vetting, the Facilities Help Desk should normally inform their point of contact that the applicant has failed vetting. If the applicant wants to know the reason behind he should follow the review process shown below. The Vetting Unit or Facilities Help Desk will not disclose information to the main contractor about the vetting failure.

3.5.2 **Internal candidates** - If an internal applicant disputes the decision to refuse, withdraw or suspend vetting a letter of appeal must be forwarded via the FVO to an officer of



ACPO/ACPOS rank, or other nominated individual who has not been involved in the original decision, within 14 days of receipt of a written notification of the decision. The officer of ACPO/ACPOS rank will consider the case within 28 days of receipt of the letter of appeal. The individual will be given the opportunity to make personal representation and may be accompanied by a friend or staff association or Trade Union representative. The officer conducting the appeal will inform the applicant in writing of the result of the appeal as soon as practicable after the decision has been made. Any decision reached will be final.

**3.5.3 External Candidates** - External applicants for have no right of appeal against a decision not to grant them vetting clearance. However they will have the right to request a review. Requests for review should be made in writing within 28 days of receiving notification of the decision not to grant clearance. The review should be conducted by a nominated individual not previously involved in the case, who has a working knowledge of vetting policies. The reviewer will view the case file together with any additional information provided by the applicant within 28 days of receipt of the letter, and will communicate the review decision in writing, as soon as practicable following the decision. Any decision made will be final.

**3.5.4** When a written request for an appeal or review has been received, where possible individuals will be provided with the reason for their refusal in writing unless doing so would be likely to:

- Damage national security;
- Result in BTP breaking any law;
- Frustrate the prevention or detection of crime;
- Impede the apprehension or prosecution of offenders;
- Result in the disclosure of sensitive information;
- Breach the confidentiality of any information provided in confidence.



### 3.6 Aftercare and Renewal of Clearance

3.6.1 Aftercare is arguably the most important part of any enhanced vetting process. Vetting is based on a 'snapshot in time'. The subject's personal circumstances can, and often will, be subject to a **significant change** over time and this may affect their suitability to maintain their clearance. It is therefore vital that the individual's suitability is assessed over time through a comprehensive aftercare regime. Specified levels of clearance are time limited and require renewal after that time period has passed.

3.6.2 It is the responsibility of the FVO to ensure that aftercare/renewals of clearances are completed.

3.6.3 Aftercare – All individuals who are subject to the vetting process must report any changes in their personal circumstances which may be of relevance to their clearance. Such changes may include, but are not limited to:

- change of home address;
- change in partner;
- co-habitant details;
- involvement in a criminal investigation as a suspect;
- arrest for criminal offence;
- conviction for a criminal offence;
- receipt of fixed penalty notice;
- bankruptcy;
- adverse County/Sheriff Court Judgement;
- entry into an Individual Voluntary Arrangement (IVA);
- known/suspected criminal association;
- relevant changes in medical condition – to be notified and acted upon by



### Occupational Health.

3.6.4 Renewals – certain levels of vetting clearance are subject to renewal. The table below shows which levels require renewal and the timescales

| Clearance Level  | Renewal Period |
|------------------|----------------|
| Baseline Vetting | 10 years       |
| NPPV Level 1     | 1 Year         |
| NPPV Level 2     | 3 Years        |
| NPPV Level 3     | 5 Years        |

3.6.6 The Professional Standards Department (PSD) will advise where they are informed of an inappropriate or compromising association which may have an impact of the applicant's vetting status.

3.6.7 Where the aftercare process reveals a change in circumstances which may have a prejudicial effect on the individual's suitability to maintain the relevant level of clearance, consideration should be given to withdrawal of that clearance. Only in the most serious of cases should clearance be withdrawn. Decisions relating to withdrawal/maintenance should be clearly documented on the applicant's vetting file.

3.6.8 The aftercare process may also reveal information which relates to a breach of Police (Conduct) Regulations/Standard of Professional Behaviour, about which BTP was previously unaware. In such circumstances, the matter must be immediately referred to the Head of PSD for appropriate action. In addition, any consideration in relation to the withdrawal of clearance in such circumstances should be made in consultation with the Head of PSD as doing so may prejudice an investigation.



### **3.7 Retention of Baseline Vetting Records**

3.7.1 All vetting records will be kept securely in Vetting Units for the following periods:

- Six years after any vetting clearance is refused or withdrawn,
- Six years after leaving BTP,
- Non Police Personnel - One year after an individual has left BTP or agency/company for which employed/contracted to at the time of vetting clearance.

## **4. MONITORING AND COMPLIANCE**

4.1 This SOP and Vetting Policy will be monitored by the FVO to ensure compliance with National Guidelines issued by ACPO Professional Standards in relation to Vetting.

4.2 The FVO will also conduct checks against Area Establishment Lists to ensure that all personnel have been correctly vetted to the appropriate level.

## **5. ASSOCIATED DOCUMENTS**

5.1 [Personal Information Questionnaire – Baseline](#)

5.2 [Personal Information Questionnaire – NPPV Level 1](#)

5.3 [Personal Information Questionnaire – NPPV Level 2](#)

5.4 [Personal Information Questionnaire – NPPV Level 3](#)

5.5 [Vetting Verification Record.](#)

5.6 [National Security Vetting Standard Operating Procedures.](#)

5.7 [Management Vetting Standard Operating Procedures \(SOP/165/08\).](#)

5.8 [Convictions, Cautions and Financial Criteria SOP](#)